

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY
15 Mountain View Road
Warren, NJ 07061-1615

Plaintiff,

v.

ALFRED KEMP, Individually and d/b/a
KEMP PLUMBING
P.O. Box 1322
Pembroke, MA 02359

and

MARTIN SANDBORG, Individually and d/b/a
SANDBORG PLUMBING AND HEATING
13 Liberty Street
Sandwich, MA 02563,

Defendants.

C.A. No.: 04-11975-RWZ
BBO# 552588

**DEFENDANT ALFRED KEMP, INDIVIDUALLY AND D/B/A KEMP
PLUMBING'S PROPOSED LIST OF WITNESSES FOR TRIAL**

Now comes the Defendant, Alfred Kemp, Individually and d/b/a Kemp Plumbing,
and hereby lists the witnesses he intends to call to testify at trial.

1. Robert Cullinane, 254 Westfield Street, Dedham, MA 02026
2. Andrew Diamond, Allison Engineering, 6 Summer Street, Millbury, MA 01527
3. Stephen Driscoll, 87 Sunnyside Road, Norwood, MA 02062
4. Quinn Horn, Exponent, Failure Analysis Associates, 21 Strathmore Road, Natick, MA 01760
5. Alfred Kemp, P.O. Box 1322, Pembroke, MA 02359.
6. Kraig Magnussen, 31 Hilltop Drive, Millis, MA 02054

7. Roger Marino, 254 Westfield Street, Dedham, MA 02026
8. Timothy Myers, Exponent, Failure Analysis Associates, 21 Strathmore Road, Natick, MA 01760
9. Philip Shields, 2 Breede Terrace, Apt. 2, Dedham, MA 02026
10. Designee for Pacific Indemnity Company, 15 Mountain View Road, Warren, NJ 07061.

The defendant reserves the right to call any of the witnesses identified on plaintiff's or co-defendant's witness list. In addition, the defendant reserves the right to call additional witnesses in rebuttal to plaintiff's case, as appropriate. Finally, should the parties not stipulate on the issue of damages, the defendant would expect to call

11. Robert LaPorte, Jr. Meredith & Grew, 160 Federal Street, Boston, MA 02110.

Respectfully submitted,
ALFRED KEMP d/b/a KEMP PLUMBING
By his attorney,

/s/ Christopher G. Betke
Christopher G. Betke, BBO# 552588
Ryan, Coughlin & Betke, LLP
175 Federal Street
Boston, MA 02110
(617) 988-8050

CERTIFICATE OF SERVICE

I, Christopher G. Betke, hereby certify that on March 19, 2007, I served a copy of the within document via electronic filing to: Matthew H. Feinburg, Esq., Feinberg & Kamholtz, 125 Summer Street, 6th Floor, Boston MA 02110; Daniel Q. Harrington, Esq., Cozen & O'Connor, 1900 Market Street 3rd Floor, Philadelphia, PA 19103; Philip Tierney, Esq., Finnegan, Underwood, Ryan & Tierney, 22 Batterymarch Street, Boston, MA 02109.

/s/ Christopher G. Betke
Christopher G. Betke